

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

NICOLE SHETLER, individually and on  
behalf of all others similarly situated,

v.

AMERCO, INC.,

Defendant.

Civil Action No. 18-867-JFC

**DEFENDANT AMERCO'S OBJECTION TO STATEMENTS IN  
PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL**

Without waiving and expressly subject to and in furtherance of AMERCO's assertion that this Court lacks personal jurisdiction over it, AMERCO objects to Plaintiff's statement in her Notice of Voluntary Dismissal [Dkt. No. 23] that each side should bear their own attorneys' fees, costs and expenses associated with Plaintiff's action against AMERCO. Nothing in Federal Rule of Civil Procedure 41 or other governing law endows Plaintiff with the unilateral authority to make such a determination, and AMERCO expressly preserves its right to pursue attorneys' fees and costs associated with having to file its Motion to Dismiss for Lack of Personal Jurisdiction or Alternatively for Failure to State a Claim [Dkt. No. 18].

Dated: October 11, 2018

Respectfully submitted,

/s/ Amy Brown Doolittle  
Amy Brown Doolittle (DC Bar No. 451090)  
*Admitted Pro Hac Vice*  
SQUIRE PATTON BOGGS (US) LLP  
2550 M Street, NW  
Washington, DC 20007  
(202) 626-6707  
amy.doolittle@squirepb.com

Allen A. Kacenjar (Ohio Bar No. 0071224)  
Squire Patton Boggs (US) LLP  
4900 Key Tower  
127 Public Square  
Cleveland, Ohio 44114  
Tel.: +1 216 479-8296  
allen.kacenjar@squirepb.com

and

Adam R. Fox (CA Bar No. 280542)  
*Admitted Pro Hac Vice*  
SQUIRE PATTON BOGGS (US) LLP  
555 So. Flower Street, Suite 3100  
Los Angeles, California 90071  
Tel: +1 213 624-2500  
adam.fox@squirepb.com

Attorneys for Defendant  
AMERCO

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served pursuant to  
Electronic Case Filing system on October 11, 2018 upon:

Benjamin J. Sweet (PA State Bar No. 87338)  
Kelly K. Iverson (PA State Bar No. 307175)  
Elizabeth Pollock-Avery (PA State Bar No. 314841)  
CARLSON LYNCH SWEET KILPELA &  
CARPENTER LLP  
1133 Penn Avenue, 5<sup>th</sup> Floor  
Pittsburgh, Pennsylvania 15222  
Tel.: +1 412 322 9243  
Fax: +1 412 231 0246

Attorneys for Plaintiff  
NICOLE SHETLER, individually and on behalf of all  
others similarly situated

/s/ Amy Brown Doolittle  
One of the Attorneys for Defendant  
AMERCO